



FLORELEE WAN
Member of NJ & NY Bars

FWan@wongfleming.com

February 16, 2022

VIA ECF

Honorable Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kathleen Calliste v. Allstate Insurance Company
Case No. 1:21-cv-02483 (DG) (SJB)

Dear Magistrate Judge Bulsara:

This office represents Defendant Allstate Insurance Company in the above-referenced matter. Please allow this correspondence to serve as the parties' joint request for an adjournment of the Settlement Conference presently scheduled for February 22, 2022. There have been no previous requests for adjournment of the settlement conference. It is respectfully submitted that the settlement conference is premature as the parties have yet to exchange discovery and obtain initial expert reports, which Your Honor had suggested at the initial conference should be exchanged prior to the settlement conference. In addition, today, I received Plaintiff's settlement demand and estimate itemizing alleged damages, and additional time will be needed for my client to evaluate and respond to the demand. Based on the foregoing, we are requesting, with Plaintiff's counsel's consent, that the Settlement Conference be adjourned.

We thank the Court for its consideration of this request.

Respectfully submitted,

WONG FLEMING, P.C.
Attorneys for Defendant

/s/ Florelee Wan

Florelee Wan, Esq.
300 East 42nd Street, 14th Floor
New York, New York 10117
(212) 643-9668
fwan@wongfleming.com

cc: Robert T. Trautmann, Esq. (via ECF)

300 EAST 42ND STREET • 14TH FLOOR • NEW YORK, NY 10017

TEL: (212) 643-9668 • FAX: (212) 643-9640

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